

1 HEATHER E. WILLIAMS, CA Bar #122664
Federal Defender
2 ERIN SNIDER, CA Bar #304781
Assistant Federal Defender
3 Office of the Federal Defender
2300 Tulare Street, Suite 330
4 Fresno, CA 93721-2226
Telephone: (559) 487-5561
5 Fax: (559) 487-5950

6 Attorneys for Defendant
KENNETH GOULD
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 KENNETH GOULD,

15 Defendant.
16

Case No. 1:21-cr-00243-JLT-SKO

**STIPULATION TO VACATE STATUS
CONFERENCE AND SET FOR TRIAL;
ORDER**

Date: May 21, 2024

Time: 8:30 a.m.

Judge: Hon. Jennifer L. Thurston

17 IT IS HEREBY STIPULATED by and between the parties through their respective
18 counsel, Assistant United States Attorney Joseph Barton, counsel for plaintiff, and Assistant
19 Federal Defender Erin Snider, counsel for Kenneth Gould, that the Court may vacate the status
20 conference currently scheduled for March 15, 2023, at 1:00 p.m. and set this matter for a jury
21 trial on May 21, 2024, at 8:30 a.m.

22 On February 27, 2023, the Court directed the parties to meet and confer and select a
23 mutually convenient trial date. The parties have selected Tuesday, May 21, 2024, at 8:30 a.m.

24 The parties agree and request that the Court make the following findings:

- 25 1. The government has produced 21,658 bates-marked items in this matter.
26 2. Counsel for Mr. Gould requires additional time to review discovery, consult with
27 her client regarding the case, conduct necessary investigation, and prepare for trial.
28 3. Counsel for Mr. Gould believes that failure to grant the above-requested

1 continuance would deny her the reasonable time necessary for effective preparation, taking into
2 account the exercise of due diligence.

3 4. The government does not object to the continuance.

4 5. Based on the above-stated findings, the ends of justice served by continuing the
5 case as requested outweigh the interest of the public and the defendant in a trial within the
6 original date prescribed by the Speedy Trial Act.

7 6. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
8 *et seq.*, within which trial must commence, the time period of March 15, 2023, to May 21, 2024,
9 inclusive, is excludable pursuant to 18 U.S. C. § 3161(h)(7)(A) and (B)(iv).

10 **IT IS SO STIPULATED.**

11 Respectfully submitted,

12
13 PHILLIP A. TALBERT
United States Attorney

14 Date: March 8, 2023

/s/ Joseph Barton
JOSEPH BARTON
Assistant United States Attorney
Attorney for Plaintiff

17 HEATHER E. WILLIAMS
18 Federal Defender

19 Date: March 8, 2023

/s/ Erin Snider
ERIN SNIDER
Assistant Federal Defender
Attorney for Defendant
KENNETH GOULD

ORDER

This case has been pending since 2021. The parties' request for a May 21, 2024, trial is DENIED. The parties shall propose a trial date in 2023.

IT IS SO ORDERED.

Dated: **March 9, 2023**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE